

EXHIBIT D

EXHIBIT 15

DAVIS
SANTOS

Jay Hulings
jhulings@dslawpc.com

October 14, 2021

David Nasse
Christian D. H. Schultz
Securities and Exchange Commission
100 F. Street, NE
Washington, DC 20549

Via E-mail: nassed@sec.gov
Via E-mail: schultzc@sec.gov

Re: Sworn Accounting; *Securities and Exchange Commission v. Robert J. Mueller, et al.*, Civil Action No.: 5:21-CV-785-XR, pending in the United States District Court for the Western District of Texas, San Antonio Division.

Dear Mr. Nasse:

Per the Order Freezing Certain Assets, Ordering an Accounting, and Preliminary Injunction entered in the above-reference action (the "**Order**"), please find enclosed the sworn accounting of Defendant Robert J. Mueller. Mr. Mueller provides this sworn accounting on behalf of himself, the entities named as Defendants or Relief Defendants, and as Co-Trustee of the MB Ohana Revocable Trust.

Please note, as we have previously discussed, that Mr. Mueller does not have access to certain financial records of the Relief Defendants, including a number of cancelled checks. Some of those records are kept in offices to which Mr. Mueller does not currently have access. When Mr. Mueller gains access to those offices, we can provide those records to you, if requested.

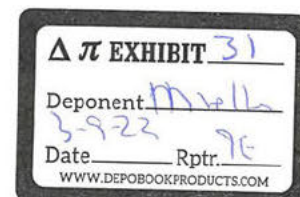
Please further note that the sworn accounting does not identify assets or bank accounts other than those expressly called for by section II of the Order. It therefore does not identify any bank accounts that are held solely in the name of Mrs. Mueller, consistent with section II.D of the Order. It also does not identify any assets that are the separate property of Mrs. Mueller or are the property of Jeffrey L. Mueller and/or Belinda G. Breen, consistent with section II.C of the Order. The sworn accounting does, however, identify the assets (consisting of a bank account) owned in the name of the MB Ohana Revocable Trust.

If you have a different understanding of the Order, or have any questions about the above or the sworn accounting, please let me know. We will be glad to discuss any clarifications that may be necessary.

Regards,

Jay Hulings

Enclosure—as stated



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SEC-RJM-E-0000015

Declaration of Robert J. Mueller

I, Robert J. Mueller, state as follows:

1. My name is Robert J. Mueller. I am over twenty-one (21) years of age, am of sound mind, and suffer no legal or mental disabilities. I have never been convicted of a felony or a crime involving moral turpitude. I am fully competent to make this declaration concerning the matters stated herein, which are within my personal knowledge and are true and correct.

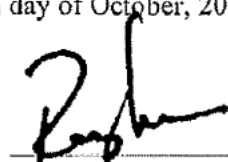
2. I am the sole owner of the entities identified as Defendants or Relief Defendants (the “**Entities**”) in the Complaint filed in *Securities and Exchange Commission v. Robert J. Mueller, et al.*, Civil Action No.: 4:21-CV-785-XR, pending in the United States District Court for the Western District of Texas, San Antonio Division (the “**Litigation**”). I am also a Co-Trustee of the MB Hale Ohana Revocable Trust. I am aware of certain financial transactions and assets of the Entities and of the MB Hale Ohana Revocable Trust.

3. I have reviewed the Order Freezing Certain Assets, Ordering an Accounting, and Preliminary Injunction, entered in the Litigation (the “**Order**”). Attached hereto as Exhibits A, B, C, D, and E are documents that summarize information requested in the “SWORN ACCOUNTING” section of the Order. The information contained in Exhibits A, B, C, D, and E is accurate to the best of my knowledge and based on the materials that are currently available to me.

4. Attached hereto as Exhibit F are true and correct copies of statements from bank accounts that have been held in my name, in the name of the Entities, or in the name of the MB Ohana Revocable Trust.

Pursuant to 28 U.S. § 1746, I declare under penalty of perjury that the forgoing is true and correct.

Executed in San Antonio, Texas on the 14th day of October, 2021.



Robert J. Mueller

DAY	BANK DESCRIPTION	AMT	BANK / SENDING PARTY / ADDRESS
6/11/2021	WT FED#00216 COMMUNITY NATIONAL /ORG-CNB FBO BRAD A LEON IRA SRF#	\$1,000,000.00	Community National Bank CNB Custody 225 Main St, Seneca, KS 66564

POLICY SERVICES INC LIFE INSURANCE ASSETS
1/2021 TO PRESENT

Carrier	Policy Name	Last Name	Status as 9/27/2021	Policy Number	Face	Policy Closing Date
Protective Life (WCL)	ANDE75		Inforce		\$2,000,000.00	1/7/2013
US Life City NY	UD33NL		Inforce		\$750,000.00	3/25/2013
SunLife Financial	SUL428		Inforce		\$300,000.00	5/27/2013
Metlife Investors	JKN22A		Inforce		\$2,500,000.00	8/19/2013
SunLife Financial	SUL429		Inforce		\$300,000.00	10/13/2013
Midland National Life	GRR553		Inforce		\$242,520.00	10/23/2013
ING Reliastar Life (VOYA)	PER437		Inforce		\$1,000,000.00	1/22/2014
John Hancock Life	FEE287		Inforce		\$500,000.00	3/19/2014
John Hancock Life	FEE548		Inforce		\$500,000.00	3/31/2014
Occidental Life	MAR790		Inforce		\$100,000.00	6/2/2015
Transamerica Life	JMD135		Inforce		\$500,000.00	6/30/2015
Protective Life (WCL)	RID363		Inforce		\$500,000.00	12/16/2016
Brighthouse Life	KFFN57		Inforce		\$500,000.00	12/21/2016
Protective Life (WCL)	LW7116		Inforce		\$1,100,000.00	4/4/2017
American General Life	JDE21L		Lapsed/Disputed		\$633,342.81	11/19/2012
Transamerica Life	SIE687		Lapsed/Disputed		\$1,500,000.00	6/2/2015
AXA Equitable Life	FERN07		Lapsed/Disputed		\$10,000,000.00	8/19/2016
Mass Mutual	HCS883		Lapsed/Disputed		\$1,540,000.00	2/2/2017
Principal	ANDR62		Lapsed/Disputed		\$1,000,000.00	4/26/2017

POLICY SERVICES INC ASSETS
> \$1,000 EXCLUDING PERMITTED
1/2021 TO PRESENT

ASSET	TYPE	AMOUNT	AS OF
Leasehold Improvements	Asset	\$99,103.66	9/27/2021
CCW Braun Heights, LLC Promissory Note	Notes Receivable	\$1,241,000.00	9/27/2021
Food Development Corp of Texas	Equity	\$435,000.00	9/27/2021
Various Life Insurance Policies and Interests	Life Ins Policies	See above	
Various Accounts Receivable	A/R	Unknown	

DEEPROOT FUNDS ASSETS
> \$1,000 EXCLUDING PERMITTED
1/2021 TO PRESENT

ASSET	TYPE	AMOUNT	AS OF
CCW Braun Heights, LLC Promissory Note	Notes Receivable	\$1,016,000.00	9/27/2021
Leasehold Improvements	Asset	\$342,276.13	9/27/2021
Equity Secure Holding, LLC	Notes Receivable	\$131,731.75	9/27/2021